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e-filed August 3, 2018

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF NEVADA**

11 In re:

12 SONIA LOPEZ

CASE NO.: 15-14086-MKN-MKN
TRUSTEE: RICK A YARNALL

CHAPTER: 13

HEARING DATE: SEPTEMBER 6, 2018
HEARING TIME: 1:30 PM

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15 Debtor(s)
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17 **OPPOSITION TO EX-PARTE MOTION TO TERMINATE THE STAY**

18 SONIA LOPEZ (hereinafter referred to as "Debtor(s)"), by and through their
19 attorney, Seth D. Ballstaedt, Esq., and hereby oppose the Motion to Terminate the stay
20 filed by Brilena, Inc. on the grounds set forth below:

- 21 1. Debtor(s) commenced this case on July 16, 2015 by filing a voluntary
22 petition for relief under Chapter 13 of Title 11 of the United States
23 Bankruptcy Code.
- 24 2. The Chapter 13 Trustee filed an Ex Parte Motion terminate the stay for
25 failure to stay current on property taxes.
- 26 3. On or about June 30, 2018, Debtor made the required payment of
27 \$2,539.50 for County Taxes in the County of Tulare.
- 28 4. Debtor requests that the Ex-Parte Motion to terminate the stay be denied
in its entirety.

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WHEREFORE, Debtor(s) pray that this honorable court:

1. DENY the Trustee's motion to terminate the stay
2. Any further just and equitable relief, this court deems appropriate.

Dated this 3 day of August, 2018

/s/ Seth D. Ballstaedt, Esq.
Seth D. Ballstaedt, Esq.
Attorney for Debtor(s)